

## DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento, CA 95814



June 2, 2000

## ALL-COUNTY INFORMATION NOTICE NO. I-56-00

TO: ALL COUNTY WELFARE DIRECTORS  
 ALL WELFARE-TO-WORK COORDINATORS  
 ALL CalWORKs PROGRAM SPECIALISTS  
 ALL FOSTER CARE INDEPENDENT LIVING  
 PROGRAM COORDINATORS

SUBJECT: CHANGES TO THE U.S. DEPARTMENT OF  
 LABOR (DOL) WELFARE-TO-WORK (WtW)  
 GRANT PROGRAM

REFER: SENATE BILL (SB) 382 (Chapter 6, Statutes of 1998); THE BALANCED BUDGET  
 ACT OF 1997, HOUSE OF REPRESENTATIVES (H.R.) 2015 (Public Law 105-33);  
 H.R. 3130 (Public Law 105-200); and H.R. 3424 (Public Law 106-113); ALL COUNTY  
 LETTER (ACL) 98-90 (dated November 18, 1998); ACL 99-20 (dated April 9, 1999);  
 CALIFORNIA DEPARTMENT OF SOCIAL SERVICE (CDSS)/EMPLOYMENT  
 DEVELOPMENT DEPARTMENT (EDD) JOINT ALL COUNTY INFORMATION  
 NOTICE (ACIN) NO. I-21-00/BULLETIN NO. WB00-13, (dated March 6, 2000)

## REASON FOR THIS TRANSMITTAL

- ☐ State Law Change
- ☐ Federal Law or Regulation Change
- ☐ Court Order or Settlement Agreement
- ☐ Clarification Requested by One or More Counties
- ☒ Initiated by CDSS

CDSS, in partnership with EDD, issued a Joint ACIN No. I-21-00 and Bulletin No. WB00-13 providing a brief summary of the amendments to the WtW Grant program established with the passage of H.R. 3424. This notice provides additional instructions to County Welfare Departments (CWDs) for the immediate implementation of H.R. 3424, including uses for the State WtW Grant matching funds in order that the new eligible populations may be served beginning July 1, 2000. This notice also includes the new eligibility categories and requirements (Enclosure 1), a glossary of terms that apply to the WtW Grant program (Enclosure 2), a list of the 25 Percent WtW Competitive Grants operating in California (Enclosure 3), and a list of the Governor's new 15 Percent Discretionary funded projects awarded on January 29, 2000 (Enclosure 4).

Because the DOL WtW Grant program is short-term, the first-year federal formula funds received by California must be expended by June 30, 2001. The DOL formula funds, distributed to the local Workforce Investment Areas and the State match, allocated to the CWDs, are only available for a limited period of time. Measures must be taken immediately to use these funds to provide needed services to the hardest-to-employ WtW Grant eligible populations, which has been expanded by H.R. 3424. CWDs must work with local WtW Grant operating entities to ensure mechanisms are in place to identify, enroll and serve the new populations with non-federal dollars by July 1, 2000. The non-federal funds include the State match but may also include other resources provided through Local Workforce Investment Boards (LWIBs), community- and faith-based organizations, private businesses and nonprofit foundations.

CDSS advocates the immediate use of the State matching funds to serve the new populations established under H.R. 3424. CWDs are strongly encouraged to work in tandem with the WtW Grant operating entities to begin serving these individuals on July 1, 2000 using the State match until the WtW formula funds can be expended on the new eligibles beginning October 1, 2000.

Agreements between CWDs and WtW Grant operating entities are supported by CDSS and EDD. Further instructions on the implementation of the H.R. 3424 amendments will be provided after the DOL WtW Grant Final Rule is published.

#### Background:

As you know, on November 29, 1999, the "Department of Labor, Health and Human Services, and Education and Related Agencies Appropriations Act of 2000" (Act) was signed into law. The Act contains the "Welfare-to-Work and Child Support Amendments of 1999," which provide, among other provisions, relief to the program eligibility criteria that will make it easier to successfully implement the DOL WtW Grant program in California. The most significant change is the removal of the "barriers to employment" requirement. Previously, under the 70 Percent provision, long-term welfare recipients and non-custodial parents (NCPs) were required to not only meet the eligibility criteria, but also to have at least two of three "barriers to employment" to participate in the WtW Grant program. The Act includes other important changes, such as expanding eligibility to young adults between the ages of 18 and 25 who were in foster care at anytime during their life, current welfare recipients with significant barriers to self-sufficiency, the working poor and NCPs whose minor children are eligible for, but not receiving California Work Opportunity and Responsibility to Kids (CalWORKs) or Temporary Assistance for Needy Families (TANF) assistance.

#### 25 Percent WtW Competitive Projects:

As soon as administratively possible, the new eligibility requirements should be used to determine program eligibility and to refer CalWORKs recipients, NCPs, and foster youth to the DOL 25 Percent WtW Competitive Grant projects. The 25 Percent grantees may also immediately provide six months of educational and vocational training as a separate allowable activity to current and new eligible participants, whether employed or not. Under current law, educational and vocational training cannot be provided to WtW Grant participants until they are participating in an employment activity such as work experience, on-the-job training, community service or job creation through public or private sector employment wage subsidies. This change will allow all WtW Grant partners to provide six months of vocational education or job training before requiring participants to engage in an employment activity to receive services.

#### Non-federal and State Matching Dollars:

As of December 1999, only \$4.4 million of the \$35 million allocated State match has been expended by CWDs, which puts the State \$23.5 million behind in meeting its obligations to match the \$55.6 million already spent of the WtW Grant formula funds. To correct this deficit, CWDs are advised to work with local WtW Grant partners to ensure these funds are used immediately to serve the hardest-to-employ. By June 29, 2001, a little over \$95 million of State match must be fully expended to meet the matching requirements for the first year DOL WtW Grant awarded to California. An additional \$88.6 million must be expended by July 15, 2002. For Budget Year 2000/001, \$60 million has been proposed as State match to fulfill the first year requirement. If the State match expenditure requirements are not met, California will be subject to payment of unmatched federal funds to DOL.

In developing innovative strategies, it is important to remember the WtW Grant formula funds provided to LWIBs and 15 Percent grantees are not available to serve the new eligible populations established with H.R. 3424 until October 1, 2000. Until then, we strongly encourage CWDs to develop innovative ways to share the matching funds with local WtW Grant operating entities so

they can also begin serving the new populations on July 1, 2000. These funds may also be used to contract with service providers, furnish transportation or child care services, establish protocols for sharing confidential information, develop linkages with local agencies, job creation, etc. CWDs are encouraged to develop and share strategies with their WtW Grant partners.

**WtW Grant Formula Funded Projects:**

Through September 30, 2000, CWDs must continue to use the current eligibility criteria defined in ACLs 98-90 and 99-20 when referring welfare recipients to the 85 Percent WtW Grant funded projects administered by LWIBs and the Governor's 15 Percent WtW subgrantees unless they have developed ways to utilize the State matching or other non-federal funds available to provide services to the new eligible populations.

**EDD Directive No. WD00-1:**

EDD has distributed Directive No. WD00-1, titled: "WtW Grant Program Eligibility" to Service Delivery Areas, PICs and County Welfare Directors. The Directive defines the WtW Grant eligibility and allowable activity requirements based on current law. Because the current statute continues to apply to the 85 Percent WtW Grant program projects administered by PICs and the 15 Percent subgrantees until October 1, 2000, CWDs will benefit from reviewing this document. CWDs may access the Directive on the Internet at <http://www.edd.ca.gov/wtowdir.htm>.

CDSS and EDD are expected to sponsor five regional training forums over the next couple of months. These forums will provide specific information regarding the changes to the program under H.R. 3424, as well as opportunities to ask questions and share best practices. Invitees will include LWIBs, CWDs, 15 Percent grantees, 25 Percent grantees, DOL, U.S. Department of Health and Human Services, IV-D agencies, and Foster Care Independent Living Program Coordinators. Locations, times and agendas will be forthcoming under separate cover.

If you have any questions regarding this notice, please contact Pat Loader, WtW Grant Policy Analyst, Employment Bureau, at (916) 654-1770.

Sincerely,

*Original Document Signed By  
Charr Lee Metsker on 6/2/00*

CHARR LEE METSKER, Chief  
Employment and Eligibility Branch

Enclosures

c: CWDA  
CSAC  
Regional Advisors

**WtW GRANT ELIGIBILITY REQUIREMENTS AND  
ALLOWABLE ACTIVITIES BASED ON  
H.R. 3424  
(Public Law 106-113)**

This document is to be used as a reference tool for implementing the changes to the WtW Grant program established with the passage of H.R. 3424. Amendments are provided in "***bold italics***" to help users identify quickly the new requirements, which means eligibility requirements and allowable activities that are not in italics have not been changed and continue to be in effect. Even though the California Work Opportunity and Responsibility to Kids (CalWORKs) is the Temporary Assistance for Needy Families (TANF) program in California, when references are made to TANF, it would be for situations where non-custodial parents' (NCP) minor children are receiving TANF in another state.

**H.R. 3424 IMPLEMENTATION DATES:**

- The 25 Percent WtW Competitive Grants may implement the new allowable activities and the sharing of information effective November 29, 1999.
- Effective January 1, 2000, the new eligibility provisions were implemented by the 25 Percent WtW Competitive Grants. County Welfare Departments (CWDs) must use these new criteria when referring welfare recipients to the 25 Percent WtW Competitive Grant projects in California.
- Effective July 1, 2000, the new eligibility and allowable activities are to be implemented using only non-federal funds.
- Effective October 1, 2000, the new eligibility and allowable activity provisions are to be implemented by the formula funded projects, which are the 85 Percent WtW Grants administered by local Workforce Investment Boards (LWIBs) and the Governor's 15 Percent WtW Discretionary subgrantees.

**70 PERCENT PROVISION**

As amended, the "barriers to employment" are no longer an eligibility requirement for long-term welfare recipients and NCPs. In addition, before H.R. 3424 was signed into law, NCP eligibility requirements were under both the 70 and the 30 percent provisions. As amended, the NCP eligibility category is now only under the 70 percent provision.

**GENERAL ELIGIBILITY REQUIREMENTS ARE:**

**1. CURRENT ADULT RECIPIENTS OF CalWORKs:**

- (a) Who have received assistance for at least 30 months or more (consecutive or not),  
or
- (b) Who will become ineligible for CalWORKs assistance within 12 months due to the federal 60-month lifetime limit on aid. This includes welfare recipients who have been exempted or received a waiver from participating in the CalWORKs welfare-to-work program by the CWD, but who would have faced ineligibility within 12 months without the exemption or waiver. [ACIN 1-70-99, p. 6, MPP 42-710]  
or

- (c) Whose minor child is within 12 months of being ineligible for CalWORKs assistance because of turning 18 years of age (refer to DOL Q&A at: <http://wtwdoleta.gov>).

2. NON-CUSTODIAL PARENTS who are:

- (a) *Unemployed, underemployment or having difficulty paying child support obligations, AND*

- (b) Their minor children:

- 1) Have received aid for 30 months or more; or

- 2) Are within 12 months of turning 18 years of age and becoming ineligible to receive CalWORKs assistance; or

- The custodial parents of NCPs' minor children:

- (i) Have received aid for 30 months or more; or

- (ii) Are within 12 months of reaching their federal lifetime limit on aid; or

- 3) *Are eligible for, or receiving, TANF or CalWORKs cash assistance; or*

- 4) *Have received TANF or CalWORKs cash assistance during the preceding year but are no longer receiving assistance; or*

- 5) *Are eligible for, or receiving, assistance under the Food Stamp program, the Supplemental Security Income program, Medicaid or the Children's Health Insurance Program, AND*

- (c) *Upon enrollment in the WtW Grant program, must enter into a written or oral personal responsibility agreement with the WtW Grant operating entity or CWD and the Child Support Agency (IV-D); and*

- 1) *The agreement must take into consideration the employment and child support status of the NCP and must be entered into not later than 30 (or, at the option of the CWD or operating entity, no later than 90) days after the NCP is enrolled in the WtW Grant program; and*

- 2) *At a minimum, the agreement must include the following:*

- *A commitment to cooperate in the establishment of paternity of the minor child, through voluntary acknowledgement or other procedures, and in the establishment of a child support order;*
- *A commitment to cooperate in the payment of child support for his/her minor child, which may include a modification of an existing support order to take into account the ability of the NCP to pay child support and participation of the NCP in the WtW Grant program;*
- *A commitment to participate in employment or related activities that will enable him/her to make regular child support payments, and if the NCP has not attained 20 years of age, such related activities may:*

- (i) *Include completion of high school,*

- (ii) *A general equivalency degree, or*
- (iii) *Other education directly related to employment; and*
- *A description of the services to be provided by the WtW Grant program; and*
- *A commitment to participate in services that are designated to assist the NCP obtain and retain employment, increase earnings, and enhance the financial and emotional contributions to the well-being of his/her minor child.*
- *As amended, the law requires before NCP information can be released by the Child Support Agency and CWDs, the safety of the custodial parent and the NCP's child(ren) be taken into account.*

**NOTE:** *As amended, the WtW Grant statute:*

- (a) *Directs Child Support Agencies (IV-D) to disclose to LWIBs the names, addresses, telephone numbers, and identifying CalWORKs case number information of NCPs residing in the Local Workforce Investment Area (LWIA) of a LWIB for the purpose of identifying and contacting NCPs for participation in the WtW Grant program.*
  - (b) *Mandates that, in order to protect custodial parents and children who may be at risk of domestic violence, this requirement will not be construed to affect any other provisions of law requiring a custodial parent to cooperate in establishing the paternity of a child or establishing or enforcing a support order with respect to a child, or entitling a custodial parent to refuse, for good cause, to provide such cooperation as a condition of assistance or benefit under any program.*
  - (c) *Requires the establishment of safeguards against the use or disclosure of information about TANF or CalWORKs applicants or recipients;*
    - 1) *The safeguards shall not prevent the CalWORKs agencies from furnishing to LWIBs addresses, telephone numbers, and identifying CalWORKs case number information of NCPs residing in the LWIA for the purpose of identifying and contacting NCPs for participation in the WtW Grant program.*
    - 2) *It further requires that the safeguards that are put in place are to ensure the information provided is used solely for that purpose.*
3. ADULTS NO LONGER RECEIVING CalWORKs ASSISTANCE

- *Individuals who are no longer receiving CalWORKs or TANF cash assistance because they have reached their federal 60-month lifetime limit on aid, but would otherwise be CalWORKs/TANF eligible if they had not reached their lifetime limit on aid, are eligible to participate in the WtW Grant program.*

**NOTE:** *Previously under the 70 percent provision, individuals who were eligible based on this criterion also had to have two of the three barriers to employment to be eligible. With the passage of H.R. 3424, the barriers to employment requirement will no longer apply.*

### **30 PERCENT PROVISION**

As amended, individuals eligible under this provision are:

#### **1. CURRENT ADULT RECIPIENTS OF CalWORKs ASSISTANCE**

- Who have not received assistance for 30 months or more **BUT** have:
  - (a) Characteristics associated with, or predictive of, long-term welfare dependence; attributes such as dropped out of school, teenage pregnancy, or having a poor work history. In addition to characteristics listed above, WtW Grant partners may designate other attributes associated with, or predictive of, long-term welfare dependence; or
  - (b) **Significant barriers to self-sufficiency.** (For example, barriers such as, but not limited to, domestic violence, homelessness, mental illness, learning disabilities, legal issues, dental problems.)

#### **2. FOSTER CARE**

*Young adults who:*

- (a) Have attained 18 but not 25 years of age; and*
- (b) Were in foster care at anytime during their life.*

(NOTE: These individuals are not required to have children, be recipients of assistance or have any other connection to public assistance other than having received foster care as a child.)

#### **3. LOW-INCOME CUSTODIAL PARENTS**

- *Who have incomes below 100 percent of the poverty line (as defined in section 673(2) of the Omnibus Budget Reconciliation Act of 1981), including any revision required by such section, applicable to a family of the size involved.*

NOTE: Individuals eligible under this criterion do not need to have any connection to CalWORKs program.

#### **4. ADULTS NO LONGER RECEIVING CalWORKs ASSISTANCE**

- Individuals who are no longer receiving CalWORKs or TANF cash assistance because they have reached their federal 60-month lifetime limit on aid, but would otherwise be CalWORKs/TANF eligible if they had not reached their lifetime limit on aid, are eligible to participate in the WtW Grant program, and have characteristics associated with or predictive of long term welfare dependence.

### **WtW GRANT ALLOWABLE ACTIVITIES:**

Activities allowed under the WtW Grant program are:

1. Job readiness activities.
2. *Six (6) months of pre-employment vocational education or job training.*

3. Employment activities:
  - (a) Community service (paid);
  - (b) Work experience (paid);
  - (c) Jobs created through public or private sector employment wage subsidies; and
  - (d) On-the-job training (paid).
4. Job placement services.
5. Post-employment services continue to include, but are not limited to, the following:
  - (a) Basic educational skills training;
  - (b) Occupational skills training;
  - (c) English-as-a-second language; and
  - (d) Mentoring.
6. Job retention and supportive services after an individual is placed in a job readiness activity, pre-employment vocational education or job training, employment activity. Such services include, but are not limited to:
  - (a) Transportation services;
  - (b) Substance abuse treatment;
  - (c) Child care assistance;
  - (d) Emergency or short-term housing assistance;
  - (e) Other supportive services.
7. Individual Development Accounts (IDAs).

NOTE: Job placement, job readiness, and post-employment services must be provided through contacts or vouchers if the operating entity is a LWIB. However, as amended by H.R. 3424, these services may be provided directly if the operating entity is not a LWIB, such as CWDs, nonprofit organizations or other private or public providers.



U.S. DEPARTMENT OF LABOR (DOL)  
WELFARE-TO-WORK (WtW) GRANT PROGRAM  
GLOSSARY OF TERMS

This document is to be used as a guide for interpreting terms used in the DOL WtW Grant program and how those terms apply to the CalWORKs program. This guide is to be used for determining eligibility and referring eligible participants to the WtW Grant program. Additional interpretations will be provided after the DOL WtW Grant Final Rule is published. References to the Temporary Assistance for Needy Families (TANF) program is for those situations when custodial parents or minor children are recipients of assistance in other state TANF programs, especially for determining eligibility for non-custodial parents (NCPs). *NOTE: words underscored within this document are for emphasis only.*

Assistance--60-Month Lifetime Limit On Aid--As provided in 45 CFR Part 260.32, dated April 12, 1999, no services or benefits funded by the WtW Grant program are considered cash assistance and do not count toward the federal 60 month lifetime limit on aid. Only cash payments, checks, reimbursements, electronic funds transfers, or any other form of payment that can legally be converted to currency and are designed to meet the ongoing basic needs of a family count toward a WtW Grant participant's Temporary Assistance for Needy Families (TANF) 60-month lifetime limit. Ongoing basic needs are defined as food, clothing, shelter, utilities, household goods, personal care items and general incidental expenses.

EXCLUDED WtW Grant benefits and services are:

1. Nonrecurring, short-term benefits that:
  - (a) are designed to deal with a specific crisis situation or episode of need;
  - (b) are not intended to meet recurrent or ongoing needs; and
  - (c) will not extend beyond four months.
2. Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision and training);
3. Supportive services, such as child care and transportation provided to families who are employed or not employed (under CalWORKs, child care and transportation services provided to recipients who are not employed, count toward the TANF 60-month lifetime limit on aid. However, under the WtW Grant program, it does not);
4. Refunded earned income tax credits;
5. Contributions to, and distributions from, Individual Development Accounts;
6. Services such as counseling, case management, peer support, child care information and referral, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support; and
7. Transportation benefits provided under a Job Access or Reverse Commute project, pursuant to Section 404(k) of the Personal Responsibility and Work Opportunity Reconciliation Act, to an individual who is not otherwise receiving assistance.

Applicants (CalWORKs applicants) mean individuals who are applying for CalWORKs assistance. Applicants are not current CalWORKs recipients. When eligibility is being determined based on the current receipt of assistance, an applicant would not qualify as a current recipient.

Applicant Self-attestation is a document used by WtW Grant operating entities to establish eligibility when the operating entity is unable to obtain verification of receipt of aid status from the CWD or another state.

NOTE: In cases where it is difficult to determine eligibility or there is a delay in obtaining the needed information to certify eligibility, CWDs and Private Industry Councils/Local Workforce Investment Boards (LWIBs) may enter into some form of agreement or have an understanding that an operating entity may use self-attestation from the individual. However, if a CWD determines after such self-attestation has been accepted by the LWIB that the individual is not eligible based on current receipt and/or length of receipt of CalWORKs/TANF assistance, the WtW Grant operating entity will be responsible for the expenditure of funds in serving the individual and such expenditures may be considered disallowed as costs by DOL.

Barriers to Employment are (1) poor work history, (2) no high school diploma or its equivalent and low skills in reading and math at or below 8.9 grade level, and (3) substance abuse that prevents an individual from obtaining and retaining employment. (Refer to ACL 98-90, page 8, Attachment II, for the definition for "poor work history" under the 70 percent category under current law.)

NOTE: Effective July 1, 2000, long-term welfare recipients and non-custodial parents will no longer be required to have two of these specific barriers to employment to be eligible to participate in the WtW Grant program. H.R. 3424 removed this requirement.

Characteristics Associated With (or predictive of) Long-term Welfare Dependence means attributes such as dropped out of school, had a child as a teenager, or has a poor work history. CWDs and local WtW Grant operating entities may designate other qualifications associated with long-term welfare dependence, as well as define what "poor work history" means under the 30 percent provision. The additional characteristics and the definition of "poor work history" should be developed collaboratively between the WtW Grant and CalWORKs partners and be included in local plans.

Child as a Teenager means an adult who had a child while he/she was a minor.

Current Recipients of Assistance (for the purpose of determining eligibility for the WtW Grant program) means custodial parents who are currently receiving CalWORKs or TANF cash assistance or who are not longer receiving CalWORKs cash assistance but are receiving CalWORKs transitional supportive services at the time of the individual's enrollment in the WtW Grant program.

Custodial Parent means the person or party who has primary physical custody of a child(ren) as defined in the California Family Code Section 3800. For the WtW Grant program, this means biological, adoptive, caretaker relative, guardian or any other person responsible for the primary care of a minor child.

Community Service, under the WtW Grant program, means a paid work experience activity. Income received by a welfare recipient in a WtW Grant community service activity is counted as regular income for the purpose of determining the family's CalWORKs cash grant.

NOTE: Current State statute requires that nonexempt CalWORKs cash assistance recipients participate in the CalWORKs welfare-to-work program. State statute also requires that, once nonexempt recipients reach their 18- or 24-month time limit, they must participate in unsubsidized employment, community service, or a combination of the two activities to meet their work participation requirements. The only paid community service activity permissible under existing State law for CalWORKs is grant-based on-the-job training, a CalWORKs welfare-to-work activity in which a participant receives a paycheck from an employer, but all or a portion of the participant's cash assistance is diverted to the employer as a wage subsidy.

*Given the above, the paid work experience, community service and paid on-the-job training employment activities provided under the WtW Grant program are not allowable activities for CalWORKs recipients who reach their 18- or 24-month time limit, but these recipients may elect to accept WtW Grant program subsidized employment positions. However, because participation in the WtW Grant activities currently cannot be counted toward meeting a recipient's CalWORKs work requirements, in order to remain eligible for CalWORKs, the recipient will be required to participate in activities that will meet the CalWORKs requirements, as well as the WtW Grant program activities.*

*Operating entities and CWDs must work together for the successful transition of CalWORKs recipients from welfare to unsubsidized employment. It is the responsibility of the local partners to inform recipients of the program choices available through CalWORKs, WtW Grant and other related programs. The local partners must ensure that recipients are aware of the advantages, disadvantages and consequences of participating in one program over another or choosing a mix of programs and services that will provide the best overall benefit and preparation for self-sufficiency and economic independence.*

**Documentation** means the information that is retained as a record in a WtW Grant participant's files or work plan that verifies WtW Grant eligibility and the receipt of CalWORKs assistance (if applicable), as well as educational level, work history, and personal characteristics. Up-to-date documentation must be maintained. Such documents may be filed in the recipient's CWD case records, CalWORKs welfare-to-work plan or the WtW Grant operating entity's files or work plan.

**NOTE:** *Federal law requires a sub-state review of documents and participant case records pertinent to the eligibility determination of individual participants. Participant records will be examined to ensure that the information necessary for making an eligibility determination is collected, documented and verified, and that all participants meet the eligibility criteria.*

**Dropped Out of School** means a person who left school before earning or receiving a high school diploma or its equivalent, such as a General Equivalency Degree (GED).

**Drug-Related Convictions** means a person who has been convicted of a felony and which has as an element the possession, use or distribution of a controlled substance. A non-custodial parent who has been convicted of a drug-related felony, and is otherwise WtW Grant eligible, may be provided employment and training services, including the post-employment and supportive services, funded by the WtW Grant program.

**NOTE:** *Section 115 of the Social Security Act, Denial of Assistance for Certain Drug-Related Convictions, provides that nothing in Section 115 shall be construed to deny an individual convicted of any offense, which is classified as a felony and which has as an element of the possession, use or distribution of a controlled substance, the benefit of federally funded job training.*

**Eligibility Determination** means when a CWD certifies or verifies WtW Grant eligibility and provides that information to the WtW Grant operating entity for the enrollment of an individual in the WtW Grant program. All information used to determine eligibility must be maintained in the CWD files.

**Enrolled** means individuals who are eligible to participate in the WtW Grant program who have completed and signed documentation with the WtW Grant operating entity allowing them to participate in scheduled WtW Grant activities. An individual must be enrolled before he/she is a WtW Grant participant. For CWDs who are providing WtW Grant services directly, the established CalWORKs welfare-to-work plan could be used for the purpose of enrollment in the WtW Grant program.

**Foster Care** (see WtW Grant Eligible Foster Children).

**Having Difficulty Paying Child Support Obligations**, pending publication of the DOL WtW Grant Final Rule, CWDs and WtW Grant operating entities can define "having difficulty paying child support obligations" based on an individual's circumstances, for example any situation that may impair an individual's ability to meet his/her child support obligation.

**Lifetime Limit on Aid**, for the purpose of WtW Grant program, means the federal TANF 60-month lifetime limit on aid.

**Local WtW Grant Partners** means CWDs, LWIBs, and any other organization or agencies working to serve the hardest-to-employ populations with the WtW Grant and other related programs.

**Non-Custodial Parents (NCPs)** are the biological or adoptive mother or father who are absent from their children's household due to divorce, separation, desertion, or any other reason, except absence occasioned solely by reason of the performance of active duty in the uniformed services of the United States.

**Operating Entity** (see WtW Grant Operating Entities).

**Participants (WtW Grant Participants)** are WtW Grant eligible individuals who are enrolled in the WtW Grant program and attending WtW Grant allowable activities.

**Penalty (CalWORKs)** occurs when, due to noncompliance with CalWORKs program requirements, a family grant is reduced or a recipient's needs are not considered in computing the family grant, e.g., when a parent fails to provide documentation that his/her children are immunized or attending school regularly. If a recipient is subject to a CalWORKs penalty at the time of WtW Grant eligibility determination and enrollment, he/she continues to be eligible to participate in the WtW Grant program as long as he/she is otherwise eligible.

**Re-determination of Eligibility**--Once an individual is determined WtW Grant eligible and enrolled in the WtW Grant program, the operating entity is not required to re-determine WtW Grant eligibility.

*NOTE: This provision also applies when a welfare recipient currently enrolled under the 30 percent provision later becomes eligible under the General Eligibility Requirements (70 percent provision). At the time the participant becomes eligible under the General Requirements, a complete re-determination of eligibility is not necessary.*

**Sanctions** occur when a CalWORKs recipient is taken out of the assistance unit for failure, without good cause, to comply with the CalWORKs work requirements.

*NOTE: If a recipient is financially sanctioned at the time of WtW eligibility determination, and eligibility is based on the individual being a "current recipient" of assistance, the sanctioned recipient may not be eligible to participate in the WtW Grant program. However, there are situations where this will not be true. For example, if the sanctioned recipient is also a NCP, and meets the NCP WtW Grant eligibility requirements, the sanctioned recipient could be eligible based on the NCP requirements. Another example is when the sanctioned recipient is a custodial parent with income below 100 percent of the poverty level. The sanctioned recipient could be eligible under the 30 percent provision for "low-income custodial parents."*

**Separate State Program for Two-Parent Families** is a State welfare program for two-parent families eligible to receive CalWORKs assistance. Even though this program is not funded by TANF dollars,

recipients continue to be eligible to participate in the WtW Grant program as long as they are otherwise WtW Grant eligible.

Significant Barriers to Self-Sufficiency are to be defined by the WtW Grant operating entities in collaboration with CWDs. Examples of such barriers are: learning disabilities, domestic abuse, mental illness, homelessness, and legal problems.

Teenage Pregnancy, as it applies to characteristics of long-term welfare dependence under the 30 percent provision, means an adult who had a child as a teenager.

Thirty-Months On Aid means the time individuals received CalWORKs or TANF cash assistance as an adult in their own assistance unit. In one eligibility category under the 70 percent provision, a current welfare recipient, or minor child of a NCPs, must have received cash assistance for 30 months or more (consecutive or not).

*NOTE: The period of time a teen parent receives assistance as a member of his/her parent's assistance unit does not count toward the teen's 30 months on aid until the day the teen's child is born (see to DOL Q&A at: <http://wtwdoleta.gov>). For a minor child of a non-custodial parent, anytime the minor child has received CalWORKs or TANF assistance does count toward the 30 months on aid for the minor child for determining eligibility for a NCP.*

Underemployed, pending publication of the DOL WtW Grant Final Rule, CWDs and WtW Grant operating entities may define situations that can be interpreted as "underemployed" based on the needs of an individual. Some examples include: individuals who are employed in a permanent full-time job but who do not make enough money to support themselves and meet their child support order; in a job with no opportunity for promotion; in a limited-term or on-call position; not employed for more than three months with the same employer. These are just some examples of underemployment.

Unemployed, pending publication of the DOL WtW Grant Final Rule, means individuals who are without a job and who want and are available for work. The determination of whether an individual is without a job shall be made in accordance with the criteria used by the Bureau of Labor Statistics of the Department of Labor in defining individuals as unemployed.

Work Experience is a paid allowable employment activity under the WtW Grant program. The work experience income received by a CalWORKs recipient in a WtW Grant activity is counted as income for the purpose of determining the family's cash assistance.

WtW Grant Eligible Foster Children, under the WtW Grant program, means a young adult who has attained 18 but not 25 years of age and who, before attaining 18 years of age, was a recipient of foster care maintenance payments or was in foster care under the responsibility of a state. Foster care is defined as a program that provides living expenses and support for a minor child who is unable to live with his/her parents and receives foster care maintenance payments. This means that if at any time within a child's lifetime he/she received foster care, the young adult who is at least 18 and but not yet 25 years of age is eligible to participate in the WtW Grant program.

WtW Grant Operating Entities are local agencies that are responsible for the implementation, operation and administration of the federal WtW Grant funds. This includes the LWIBs, the Governor's 15 Percent Discretionary subgrantees, or the 25 Percent WtW Competitive Grant projects.

WtW Grant Partners are CWDs, LWIBs, 15 percent and 25 percent grantees, as well as any other organization or agency partnering in serving the hardest-to-employ populations.

**25 PERCENT WtW COMPETITIVE GRANTS  
IN CALIFORNIA**

<u>Agency</u>	<u>Round</u>	<u>Phone #/Grant Amount</u>
CHARO Alliance WtW Edie Glass 3951 East Medford Los Angeles, CA 90063 (child care, public housing, non-traditional occupations, micro-enterprise development & community saturation strategy)	Rd 1	(213) 269-0751 Fax 266-4326 \$3,999,590
Los Angeles County PIC Kenneth Kessler 3175 West Sixth Street Los Angeles, CA 90020 (increase child support payment by finding employment opportunities for non-custodial parents)	Rd 1	(213) 738-2620 Fax 380-8275 \$3,000,000
PIC of San Francisco, Inc. Joyce Crum 1650 Mission Street, Suite 300 San Francisco, CA 94103-2490 (substance abuse & public housing serving long-term welfare recipient with multiple barriers to employment)	Rd 1	(415) 431-8700 Fax 431-8702 \$4,189,231
The Cambodian Family Rifka Hirsch 1111 E. Wakeham Ave. Santa Ana, CA 92705 (comprehensive & neighborhood based program to find jobs & promote family self-sufficiency)	Rd 1	(714) 571-1966 Fax 571-1974 \$1,216,167
Community Rehabilitation Inc. Becky Tschirgi 1505 East Anaheim Street Long Beach, CA 90813 (non-custodial parents with disabilities, transportation services, child care, employment services, basic-learning skills training & public housing)	Rd 1	(562) 591-0539 Fax 599-2872 \$3,669,874
City of L.A. Housing Authority Gloria Moore 2600 Wilshire Blvd. Los Angeles, CA 90057 (public housing & community saturation strategy to serve those long-term welfare recipients with learning disabilities & substance abuse problems)	Rd 1	(213) 252-2763 Fax 252-5482 \$5,000,000

<u>Agency</u>	<u>Round</u>	<u>Phone #/Grant Amount</u>
Merced County Community Action Agency Pat Habec 561 W. 18 <sup>th</sup> Street P.O. Box 2085 Merced, CA 95344-0085 (domestic violence, public housing, non-traditional occupations, micro-enterprise development & rural areas; self-employment focused training or better jobs training)	Rd 1	(209) 723-2201 Fax 723-4410 \$1,878,120
Oakland PIC Evelyn Ashcroft 1212 Broadway, Suite 300 Oakland, CA 94612-3025 (provide transitional services for those welfare recipients engaged in work activities)	Rd 1	(510) 768-4406 Fax 839-3766 \$5,000,000
City of Oakland Floretta Chisom 150 Frank Ogawa Plaza Oakland, CA 94612 (child care & non-traditional occupations)	Rd 1	(510) 238-3646 Fax 238-7207 \$2,000,000
Richmond PIC Upezi Mtambuzi 330 25 <sup>th</sup> Street Richmond, CA 94804 (non-custodial parents & non-traditional occupations through providing job search & job readiness services)	Rd 1	(510) 307-8015 Fax 307-8072 \$3,087,347
Riverside Co. Economic Dev. Ag./ Workforce Development Board Richard G. E. Galope 1151 Spruce Street Riverside, CA 92507 (post-employment, job readiness, job retention services & supportive services that include transportation services)	Rd 1	(909) 955-3100 Fax 955-3131 \$4,450,000
African American Unity Center Judy Vinson 5300 S. Vermont Avenue Los Angeles, CA 90037 (non-custodial parents, learning disabilities, substance abuse, public housing & transportation)	Rd 2	(213) 789-7300 Fax 752-8331 \$1,357,885
Beyond Shelter Justine Waters 3255 Wilshire Blvd., Suite 902 Los Angeles, CA 90010 (information not available)	Rd 2	(213) 570-4564 Fax 480-0846 \$1,199,700

<u>Agency</u>	<u>Round</u>	<u>Phone #/Grant Amounts</u>
Goodwill Industries of So. Calif. Margaret O'Brien 342 San Fernando Rd. Los Angeles, CA 90031 (learning & other disabilities, substance abuse, basic skills, English as a second language, job readiness)	Rd 2	(213) 223-1211 Fax 343-9927 \$4,098,265
Catholic Charities of Los Angeles Ron Lopez 1531 West Ninth Street P.O. Box 15095 Los Angeles, CA 90015 (transportation, child care, mentoring, English as a second language, counseling, emergency services, parenting classes and tuition reimbursement)	Rd 2	(213) 251-3412 Fax 380-4603 \$3,037,423
City of Long Beach Department of Community Development Judith Carey 200 Pine Ave. 4 <sup>th</sup> Floor Long Beach, CA 90802 (non-custodial parents, public housing employment, post- employment & supportive services)	Rd 2	(562) 570-4514 Fax 570-4571 \$5,000,000
Jobs for Homeless Consortium Michael Daniels 1722 Broadway Oakland, CA 94612 (non-custodial parents, homeless, learning disabled, substance abuse & nontraditional occupations for women)	Rd 2	(510) 587-7391 Fax 287-8484 \$1,365,336
San Diego Workforce Partnership, Inc. Mary Bernard 1551 4 <sup>th</sup> Avenue, Suite 600 San Diego, CA 92101 (transportation, child care, public housing & one-stop centers for WtW Grant participants)	Rd 2	(619) 238-1445 Fax 238-6063 \$5,000,000
County of Tulare PIC Adam Peck 2373 W. Whitendale Visalia, CA 93277 (transportation, child care, public housing & address other barriers to employment for long-term welfare recipients)	Rd 2	(209) 737-4246 Fax 737-4252 \$3,824,201



Enclosure 3 (continued)

<u>Agency</u>	<u>Round</u>	<u>Phone #/Grant Amount</u>
City of Gilroy Annabel Yurutucu 7351 Rosanna Street Gilroy, CA 95020 (transportation)	Rd 3	(310) 820-6968 Fax 820-9108 \$1,401,528
1736 Family Crisis Center Carol Adelfkoff 3375 S. Hoover Street, Suite K Los Angeles, CA 90007 (domestic violence, child care, subsidized employment & post-employment services)	Rd 3	(213) 741-5050 X 300 Fax 749-3307 \$4,289,858
Sacramento Federation of Program Operators (SFPO) May O. Lee 801 Broadway, Suite A Sacramento, CA 95818 (English as a second language, job placement & small business development)	Rd 3	(916) 324-6201 Fax 324-6230 \$1,149,698
Center Point, Inc. Ms. Tamara Shields 809 B Street San Rafael, CA 94901 (substance abuse, post-employment services which includes English as a second language, basic education, mentoring & counseling, short-term public housing, child care & transportation)	Rd 3	(415) 454-7777 Fax 454-7785 \$2,211,281
San Joaquin County John Solis San Joaquin County Stockton, CA 95202 (non-custodial parents for job training, job readiness & community services, transportation & substance abuse)	Rd 3	(209) 468-3500  \$5,000,000
<b>MULTI-SITE PROJECTS:</b>		
CET Welfare-to-Work National Proj. Antonio Sanchez 701 Vine Street San Jose, CA 95110 (rural areas)	Rd 1  (CA)	(408) 534-5440 Fax 993-8421
National Association of PICs Robert Knight 1201 New York Ave., NW, Suite 350 Washington, DC 20005	Rd 1  (L.A. County)	(202) 289-2950 Fax 289-2846

<u>Agency</u>	<u>Round</u>	<u>Phone #/Grant Amount</u>
<b>MULTI-SITE PROJECTS (continued)</b>		
YouthBuild USA Anne Wright 58 Day Street Somerville, MA 02144	Rd 1  (Santa Rosa, CA)	(617) 623-9900 Fax 623-4331
Marriott International Community Employment & Training Programs Allen Brown One Marriott Drive, Department 52/935.47 Washington, DC 20058	Rd 2  (CA)	(301) 380-8596 Fax 380-4710
The America Works Partnership Edward J. Gorman III 1750 New York Ave., N.W. Suite 210 Washington, DC 20006	Rd 2  (CA)	(202) 639-8811 Fax 639-9780
John Hopkins University Melissa Siberts 3400 North Charles Street Wyman Park Medical Bldg. Baltimore City, MD 21218	Rd 2  (CA)	(410) 516-4556 Fax 516-4775
Hispanic Association of Colleges and Universities Jo Marie Cano 8415 Datapoint Dr. Suite 400 San Antonio, TX 78229	Rd 2  (CA)	(210) 615-0841 Fax 615-8740
National Homes Trust Doug Rosen 12100 Wilshire Blvd. Los Angeles, CA 90025 (substance abuse)	Rd 3  (CA)	(310) 820-6968 Fax 820-9108
The Welfare to Work Partnership Elisa Johnson 1250 Connecticut Ave. N.W. Washington, DC 20036	Rd 3  (LA Co.)	(202) 955-3005 X 321 Fax 955-1087

**GOVERNOR'S  
15 PERCENT WtW DISCRETIONARY SUBGRANTEES**  
(January 29, 2000)

<u>AWARDS</u>	<u>GRANT AMOUNT</u>
<b>American Works Partnership, City of Oakland (Alameda County)</b> Attention: Hugh Bailey at (202) 639-9780 1750 New York Avenue, NW Suite 210 Washington, DC 20006 (subsidized, pre-apprenticeship work experience in construction)	\$746,598
<b>Anaheim Transportation Network (Orange County)</b> Attention: Laurie Smith at (714) 563-5287 94 S. Anaheim Boulevard Anaheim CA 92805 (transportation services)	657,152
<b>ARBOR, Inc. (Stanislaus County)</b> Attention: Charles Jameson at (610) 566-8700 One West Third Street Media, PA 19063 (career advancement through subsidized & unsubsidized employment)	727,024
<b>California Emergency Foodlink (Sacramento County)</b> Attention: Diana Maffei at (916) 387-9000 P. O. Box 292700 Sacramento, CA 95829 (delivery driver employment certification training)	517,709
<b>City of Oxnard (Ventura County)</b> Attention: Norma Owens at (805) 385-7477 300 West Third Street, 4 <sup>th</sup> Floor Oxnard, CA 93030 (work experience & case management)	717,830
<b>Community Employment Project, Inc., Pomona (Los Angeles County)</b> Attention: Robert Gulden at (562) 863-4786 11550 E. Rosecrans San Diego, CA 92110 (job readiness, job placement, community service, work experience, OJT, job creation, post-employment, job retention/ supportive services for Cambodian, Vietnamese, and Laotian WtW Grant participants)	808,778

<u>AWARDS</u>	<u>GRANT AMOUNT</u>
East Bay Asian Local Development Corporation, Fruitvale, San Antonio, TX (Oakland in Alameda County) Attention: Hiroko Kurihara at (510) 287-5353 ext. 447 310 8 <sup>th</sup> Street, Suite 200 Oakland, CA 94607 (intensive vocational English-as-a-second language training while participating in work experience activities for Cambodian, Vietnamese, Laotian, and Latino cultures)	\$975,995
Fresno County Economic Opportunities Commission (Fresno County) Attention: Paul McLain at (559) 264-1048 1920 Mariposa Mall, Suite 330 Fresno, CA 93721 (non-custodial parents providing vocational and educational training)	781,200
Goodwill Industries of San Diego (San Diego County) Attention: Sharon J. Corrigari at (619) 225-2200 3663 Rosecrans San Diego, CA 92110 (CalWORKs exempt recipients caring for persons with disabilities & long-term welfare recipients with limited English proficiency or learning disabilities in on the job training positions)	241,490
Goodwill Industries of Redwood Empire (Lake County) Attention: bob Thomas at (707) 523-0550 651 Yolanda Avenue Santa Rosa, CA 95404 (work experience in conjunction with skills training, basic education and GED preparation)	791,053
Imperial Valley Regional Occupational Program (Imperial County) Attention: Mary N. Camacho at (760) 312-6434 1398 Sperber Road El Centro, CA 92243 (incorporates an intensive case management, English as a second language & subsidized employment with peer mentoring in rural areas)	760,466
Los Angeles Valley College, San Fernando Valley (Los Angeles County) Attention: Lynne Brower at (818) 947 2974 5800 Fulton Avenue Valley Glen, CA 91401 (place victims of domestic violence in unsubsidized employment, upgrade skills and provide mentoring services)	313,200

<u>AWARDS</u>	<u>GRANT AMOUNT</u>
<b>Mexican American Opportunity Foundation (Orange County)</b> Attention: Carlos Jimenez at (714) 835-4199 502 S. Ross Street Santa Ana, CA 92701 (child care training program)	970,854
<b>New Bridge Foundation (Alameda County)</b> Attention: Marsha Jones Siby at (510) 845-0880 1820 Scenic Avenue P. O. Box 524 Berkeley, CA 94704 (job readiness, employment and non-medical substance abuse treatment to long-term welfare recipients)	999,999
<b>PRIDE Industries, Sacramento City (Sacramento County)</b> Attention: Samuel K. Seaton at (916) 783-5266 One Sierragate Plaza, Suite A200 Roseville, CA 95678 (long-term welfare recipients with barriers to employment)	999,999
<b>Richmond City Employment and Training Program (Contra Costa Co.)</b> Attention: Upesi Mtambuzi at (510) 307-8015 330 25 <sup>th</sup> Street Richmond, CA 94804 (short-term subsidized and unsubsidized employment & other services for long-term welfare recipients)	680,000
<b>Rubicon Programs Incorporated, Greater San Francisco Bay Area (Contra Costa County)</b> Attention: Sherry Hirsch at (510) 235-1516 2500 Bissell Avenue Richmond, CA 94804 (mental and or substance abuse disabilities, subsidized & unsubsidized employment, family support, & job retention services)	691,994
<b>Rural Human Services Inc. (Del Norte County)</b> Attention: Dennis Conger at (707) 464-7441 286 M Street, Suite A Crescent City, CA 95531 (job readiness, work experience, classroom training & OJT to place welfare recipients in unsubsidized employment with high tech employers in the area)	691,205
<b>San Diego Urban League, Inc. (San Diego County)</b> Attention: Maurice Wilson at (619) 263-819-6720 Gateway Center Drive San Diego, CA 92102 (refugee clients, provide job readiness training, work experience, OJT, & unsubsidized placements)	597,105

**AWARDS****GRANT AMOUNT**

<p><b>Tulare County Private Industry Council</b> (Tulare County)          Attention: Adam Peck at (559) 737-4246          P. O. Box 3146          Visalia, CA 93278          (non-custodial parents, job readiness, OTJ &amp; unsubsidized employment)</p>	<p>725,805</p>
<p><b>West Sacramento Housing Development Corporation</b> (Yolo County)          Attention: Donna Wolfe at (916) 372-4250          2455 West Capitol Avenue          West Sacramento, CA 95691          (train &amp; place non-English speaking immigrants in construction industry)</p>	<p>787,158</p>
<p><b>Yuba County Office of Education</b> (Sutter/Yuba Counties)          Attention: David Shirah at (530) 741-6213 ext. 115          938 144<sup>th</sup> street          Marysville, Ca 95901          (not available)</p>	<p>986,995</p>

Total:	<b><u>\$16,169,609</u></b>
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